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April 7, 2009

VIA CERTIFIED AND ELECTRONIC MAIL

Mr. Sam Borries
On-Scene Coordinator
U.S. Environmental Protection Agency
Region 5
77 West Jackson Blvd. SE-5J
Chicago, IL 60604

Mr. Paul T. Bucholtz
MDEQ-RRD
P.O. Box 30426
Constitution Hall – 3rd Floor South
Lansing, MI 48909-7973

**Re: Administrative Settlement Agreement and Order on Consent for
Removal Action, Docket No. V-W-07-C-863
Allied Paper/Portage Creek/Kalamazoo River Superfund Site
Allegan and Kalamazoo Counties, Michigan**

Dear Messrs. Borries and Bucholtz:

On behalf of Millennium Holdings, LLC (“MHLLC”), I write to request a reduction in the amount of financial security provided for the Time Critical Removal Action pursuant to Paragraph 80 of the above-referenced Administrative Settlement Agreement and Order on Consent (“ASAOC”). In accordance with Paragraph 78 of the ASAOC, in May 2007, MHLLC submitted a Payment Bond (Bond # KO7545435) in the face amount of \$11,550,000 to secure its share of the Plainwell TCRA work. A copy of that Payment Bond is attached for your information.

We have passed the second anniversary of the signing of the Plainwell ASAOC and the vast majority of the project has been completed. Arcadis has estimated that the cost of the work remaining, including post-removal site control, is \$973,000. A copy of the Arcadis estimate is attached. While MHLLC is not the only signatory to the ASAOC, we propose to reduce the amount of our Payment Bond to \$1 million, slightly in excess of the total amount of work outstanding. This should provide EPA with more than adequate security for completion of the TCRA. Given the modest amount of work that remains to be completed and the fact that the Payment Bond is specific to the TCRA work covered by this ASAOC, there is no longer a basis to require MHLLC to maintain a Payment Bond in the amount of \$11.55 million.

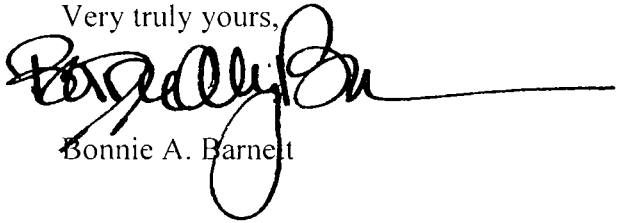


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Please let us know if you need any additional information to respond to our request for a reduction in the amount of our Payment Bond. Thank you for your consideration and we look forward to hearing from you.

Very truly yours,

A handwritten signature in black ink, appearing to read 'Bonnie A. Barnett', with a long horizontal line extending to the right.

Bonnie A. Barnett

BAB

cc: James Saric
Leslie Kirby Miles, Esquire
Polly Synk, Esquire
Ms. Sharon Hanshue
J. Michael Davis, Esquire
Steven Cook, Esquire
Ms. Deborah W. Kryak
Suda Arakere